

EXHIBIT B

Declaration of Ronald Green

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2 Ronald D. Green (NV Bar No. 7360)

3 Alex J. Shepard (NV Bar No. 13582)

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9 Attorneys for Defendants

10 Stephen Fairfax and MTechnology

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 SWITCH, LTD.,
14 a Nevada limited liability company,

15 Plaintiff,

16 vs.

17 STEPHEN FAIRFAX; MTECHNOLOGY;
18 DOES 1 through 10; and ROE ENTITIES 11
19 through 20, inclusive,

20 Defendants.

21 Case No.: 2:17-cv-02651-GMN-VCF

22 **DECLARATION OF RONALD D. GREEN**

23 I, Ronald D. Green, Jr., under penalty of perjury, hereby declare as follows:

24 1. I am a partner at the law firm Randazza Legal Group, PLLC and
25 counsel for Defendants MTechnology ("MTech") and Stephen Fairfax in the
above-referenced matter.

26 2. I am over the age of 18 and I make the statements in this declaration
27 pursuant to my own first-hand knowledge and would be competent to testify to
the statements made therein.

1 3. Plaintiff Switch, Ltd. ("Switch") and Defendants MTech and Mr. Fairfax
2 differ on the appropriate contents of the eventual protective order that will
3 govern this case.

4 4. The parties have attempted in good faith to resolve these differences
5 by conducting two meet and confer conferences on August 23, 2019 and August
6 29, 2019.

7 5. Despite these attempts, the parties have been unable to resolve their
8 differences, necessitating the intervention of this Court.

9 6. During the meet and confer conference on August 29, 2019, Sam
10 Castor, in-house counsel for Switch, said on two separate occasions that Switch
11 needed discovery in this case to “substantiate” its anticipated claims against
12 Aligned Data Centers, one of Switch’s primary competitors.

13 7. Mr. Castor additionally misrepresented that Switch had dismissed its
14 claims against Aligned Data Centers in the U.S. District Court for the Eastern District
15 of Texas without prejudice. However, those claims were dismissed with prejudice.

16 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the
17 foregoing is true and correct.

Executed on: 3rd day of September, 2019.

/s/ Ronald D. Green
Ronald D. Green, Esq.